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April 21, 1983

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Office of Regional Counsel
U.S. Environmental Protection Agency
Region I
John F. Kennedy Federal Building
Room 2203

Boston, Massachusetts 02203

Re: Picillo Waste Disposal Site - Coventry, Rhode Island - Request for Information

Superfund Records Center SITE PICILO
BREAK 11,9
OTHE 644 192

SEMS DocID 644292

Dear Mr. Blumstein:

EDWARD M. WATSON
ROBERT F. PICKARD
RICHARD F. STAPLES
ROBERT W. SHADD
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PAUL A. SILVER GREGORY L. BENIK ROBERT C. BRUNS RICHARD G. SMALL JOHN J. HYNES

The Philip A. Hunt Chemical Corporation ("Hunt Chemical") has referred to our attention Mr. Lester Sutton's letter to Hunt Chemical dated March 10, 1983, in connection with the above matter. We believe that the following is responsive to your request for further information.

- 1. The statement from Hunt Chemical's August 25, 1982 letter to EPA that was quoted in paragraph 1 of Mr. Sutton's March 10, 1983 letter, applies, to the best of Hunt Chemical's knowledge, to all Hunt Chemical facilities.
- 2. (a) Except as discussed in subparagraph (b) below, to the best of Hunt Chemical's knowledge, between January 1, 1976 and December 31, 1977, Hunt Chemical arranged for the disposal in the State of Rhode Island of hazardous wastes generated only by Hunt Chemical's Rhode Island manufacturing facilities.
- (b) Between January 1, 1976 and December 31, 1977, Hunt Chemical used Capco Trucking Co. of Cranston, Rhode Island to dispose of its wastes. Hunt Chemical does not possess any documents or other information from which it can determine if, in fact, the waste material picked-up by Capco Trucking Co. from Hunt Chemical's Rhode Island facilities during the period in question was ultimately disposed of in the State of Rhode Island or, if such waste material was ultimately disposed of in Rhode Island, the location of such ultimate disposal. The types and quantity of wastes picked-up by Capco Trucking at Hunt Chemical's Rhode Island plants during the period in ques-



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Joel Blumstein, Esq.
U.S. Environmental Protection Agency
April 21, 1983
Page Two

tion and the dates of pick-up are disclosed in the documents we are producing in this letter.

In addition to the hazardous wastes referred to above, it is probable that during the period in question ammoniacal spent etchant, from 55 gallon drums, from Hunt Chemical's Long Island City, New York facility was disposed of or recycled at ARS Chemical, Providence, Rhode Island. Hunt Chemical has no records or documents in its possession which concern, refer, or relate to the shipment of ammoniacal spent etchant to the ARS Chemical facility. Nor does Hunt Chemical possess any other information from which it can determine the quantity of such wastes disposed of or recycled at ARS Chemical or the dates of such disposal or recycling.

- (c) Between January 1, 1976 and December 31, 1977, Hunt Chemical did not use the services of any of the companies or individuals listed in Mr. Sutton's letter to dispose, treat, or recycle wastes. However, during this period, Hunt Chemical used the services of Capco Trucking Co. of Cranston, Rhode Island to transport its wastes. During this time, it was Hunt Chemical's understanding that Dan Capuano and, perhaps, other members of the Capuano family were principals in this company.
 - (d) See documents enclosed herewith.
 - 3. Yes.
- 4. For many years, Hunt Chemical had a drum deposit program, which was designed to encourage the return of its drums, in connection with the Long Island City, New York facility. This program continued until 1981, when the Long Island City plant was closed.
- (a) The program included the recycling or reclamation of spent ferric chloride or etchant.
- (b) With appropriate treatment virtually all of the spent etchant returned to Hunt Chemical's Long Island City facility could be recycled or reclaimed.
 - (c) Not Applicable.

Very truly yours,

Gregory L. Benik

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enclosures